

## Information Technology Policy Committee (ITPC)

### Social Media Policy

Policy Number: IT-019

Effective Date: April 29, 2019

#### 1. Overview

Over 70% of American adults use social media to digitally connect with each other, keep up with news events, share information, and entertain themselves (Pew Research Center, Internet & Technology, 2018). As a vital tool for resident and business engagement, City of Los Angeles elected officials and departments use social media tools (such as Facebook, Instagram, Snapchat, Twitter, and YouTube) to reach and engage a broader audience and to communicate with the public regarding programs, services, resources, and opportunities at the City of Los Angeles. While the City's website ([www.lacity.org](http://www.lacity.org)) and social media accounts like @LACity ([twitter.com/LACity](https://twitter.com/LACity)) have become the City's primary internet and social media presence, a host of elected official, department websites and social media accounts directly engage constituents and businesses on a daily basis.

#### 2. Purpose

- 2.1. This policy on social media provides procedures and standards for the use of City social media tools, including the use, management, design, development, and maintenance of these accounts and platforms.
- 2.2. Given that many City employees use various social media tools in their personal lives, this policy also provides basic guidelines for City employees while using social media tools as private citizens.

#### 3. Objective

- 3.1. The intent of the City of Los Angeles Policy on Social Media is to guide City employees, provide expectations and best practices, as well as a framework for the use and administration of social media accounts and content that is attributed to the City.

#### 4. Scope

- 4.1. This policy applies to all social media accounts and tools owned and/or utilized by the City of Los Angeles and governs the use, management, design, development, and maintenance of these social media accounts and tools. This includes, but is not limited to full-time employees, part-time employees, contractors, interns, student workers, and those acting on behalf of the City when using and/or managing social media accounts and tools owned by the City.
- 4.2. Additionally, this policy also provides guidelines for employees when communicating as private citizens on personal social media accounts.
- 4.3. This policy is intended to complement the [City Internet Usage Policy](#) and [Web Content Policy](#).

#### 5. Definitions

- 5.1. **City Social Media** - Social media accounts and/or websites established or administered by an employee or contractor of the City of Los Angeles, using City resources, and authorized by their designated department manager to administer accounts or websites to communicate and engage with the public about City business.

- 5.2. **Social Media** - Online communications channels dedicated to community-based input, interaction, content-sharing, content-creation, and collaboration. These channels include social networking sites, platforms, and applications, weblogs (blogs, vlogs, or microblogs), podcasts, online chat sites, forums, and video/photo posting sites or any other such similar output or format. Examples include, but are not limited to Facebook, Medium, Twitter, Tumblr, LinkedIn, Instagram, Snap, and YouTube.
- 5.3 **Social Media Account Administrators** - City employees designated by their departments to administer social media accounts. A social media administrator's authority reflects direction from their designated department manager and the policies and procedures of the department and the City.
- 5.4. **Social Media Account Moderators** - City employees designated by their departments to moderate the content and comments posted on a department's social media accounts. A social media moderator's authority reflects direction from their designated department manager and the policies and procedures of the department and the City.

## 6. Responsibilities

- 6.1. Each department is responsible for designating a social media administrator(s) to implement and ensure compliance with this policy.
- 6.2. Each social media administrator is responsible for managing and maintaining their department's social media accounts and tools and shall:
  - 6.2.1. Ensure the department's social media accounts are regularly maintained and that posting to those social media accounts occurs regularly.
  - 6.2.2. Ensure that department managers are informed about social media activities.
  - 6.2.3. Review content posted to the department's social media accounts to ensure the content is timely, professional, and relevant to department activities and resources, and is consistent with the City's policies and applicable law. Frequent review of accounts that provide the opportunity for constituent comment or other engagement is critical.
  - 6.2.4. Ensure that the City is in compliance with the rules, guidelines, and policies of the social media sites, platforms, and accounts being used.
- 6.3 City employees, contractors, student workers, and/or interns whose official responsibilities include creating or posting content to a City social media account are responsible for ensuring that the content is relevant to the department's mission, professionally presented, accurate, and respectful to Los Angeles' diverse communities. Social media administrators must ensure that grammar, punctuation, and spelling are correct. Mistakes must be corrected promptly.
- 6.4 Each department shall assign a Social Media Moderator who is responsible for ensuring that: (1) accounts are in active use; (2) content published by the City is timely and accurate; (3) comments are checked and reviewed on a regular basis; and (4) comments are moderated according to this policy.
- 6.5 Each department shall provide authorized users with a copy of this policy and the user is required to acknowledge their understanding and acceptance by signing and dating the last page of this document and returning the original copy to the department head or their designee.

## **7. General Governance and Oversight of City Social Media Accounts**

- 7.1. New accounts and handles must be registered with ITA to ensure ITA has an accurate accounting of social media accounts across departments and elected official offices.
- 7.2. In disaster or emergency situations, departments' use of social media should defer to the Mayor's Office, Emergency Management Department, LAFD, LAPD, and/or other relevant public safety and emergency management departments to ensure that emergency communications are timely and accurate for the optimal safety of Los Angeles residents.
- 7.3. Each departmental social media account must be approved by the appropriate department manager.
- 7.4. Requests to establish departmental social media accounts must include a reason for establishing such an account and a strategy for regular use of the account. Requests will be submitted to the appropriate department manager who will review and recommend approval or denial of the request. A department may have multiple social media accounts if it can be demonstrated that more than one account will effectively serve City goals.
- 7.5. All City social media accounts shall utilize City contact information (e.g., lacity.org email address) for account setup, monitoring, and access. The use of personal email accounts or personal phone numbers is not allowed for the purpose of setting up City social media. When the social media platform requires an individual's name associated with the account, the creator of the account shall obtain an approved name from the department manager.
- 7.6. Persons responsible for setting up or maintaining City social media accounts shall securely provide each administrator's access, login, and password information to their designated department manager where applicable. Any changes in login, password, or administrator access information must be reported immediately to all aforementioned personnel. The security of this login information is also paramount to ensure there is no unauthorized access to the account and must follow the City's security policies.

## **8. Design and Content of Social Media**

- 8.1. All authorized City social media accounts shall clearly indicate that they are administered by the City of Los Angeles and shall prominently display City contact information.
  - 8.1.1. All City social media accounts shall prominently display the following City trademarks: the City seal and/or the words "City of Los Angeles," department logo and/or name, and a link to the City and/or department website.
  - 8.1.2. City social media accounts may contain information that represents or appears to represent the City's position on policy issues or other matters affecting City business and/or the official public positions of the City's leaders subject to the section below on Content Prohibition.
- 8.2. Content Prohibition. No information posted by the City on City social media accounts shall contain content: (1) regarding any political candidate or ballot measure, except to the limited extent permitted by law or in relation to the City Clerk and City Ethics Commission's regulatory duties; (2) that contains obscene or sexual content or links to obscene or sexual content; (3) that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, national origin, physical or mental disability, or sexual orientation; (4) that is primarily commercial in nature; (5) that condones or encourages illegal activity; or (6) that violates City (including City Charter or Administrative Code), state, or federal law including, but

not limited to, trademark and copyright law. Additionally, information posted by the City shall not include endorsement or links to private entities, except as necessary to the operation of a City program, and, in that circumstance, shall also include the following disclaimer: "Acknowledgment of any entity or person(s) on this page does not constitute the City's support or endorsement of it or its products or services."

- 8.3. Comments from the public are allowed on the City's social media accounts and shall be monitored daily (see Attachment A - City of Los Angeles Social Media Commenting Policy Notice).

- 8.3.1. The City's Comment Policy Notice must be made available online. The Comment Policy Notice shall state text as defined in Attachment A - City of Los Angeles Commenting Policy Notice.

- 8.3.2. The moderator shall monitor the comments posted by the public. With the approval of the department head or elected official, comments that are contrary to the rules identified herein shall be removed or restricted. The City Attorney is available to provide legal advice on the potential removal of content. The general goal of comment moderation is to provide a forum where individuals can freely express their opinions without infringing on the ability of others to do so.

- 8.3.3. If comments do not otherwise violate this policy, then the content should be allowed to remain, regardless of whether it is favorable or unfavorable to the City, or to any City official, employee, board, or department.

- 8.3.4. The City reserves the right to remove any content that is deemed to be in violation of this policy or any applicable law.

- 8.3.5. All postings and comments, including any removed postings or comments, shall be saved in accordance with the City's record retention policy.

- 8.3.6. Illegal, or potentially illegal, activity should be reported to the Los Angeles Police Department promptly.

- 8.3.7. Social media administrators should make a good faith effort to respond to public and private messages and comments where appropriate.

- 8.3.8. Users who repeatedly violate City comment guidelines may be blocked. An account may only be blocked after multiple violations of this policy have been recorded and submitted to a supervisor and the action of blocking an account has been agreed upon by, at the very least, the social media administrator and their designated department supervisor. If further guidance is needed, please consult the City Attorney.

## **9. Accessibility**

- 9.1. All City social media posts and contents must comply with the federal Rehabilitation Act of 1973 §508, as amended (29 U.S.C. § 794d), to ensure individuals with disabilities are provided equal access to City social media's sites. Section 508 of the Rehabilitation Act, as amended, "was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities, and to encourage development of technologies that will help achieve these goals."

- 9.2. All City social media posts and contents must comply with the following current [City of Los Angeles Citywide Disability Compliance Policies and Procedures](#):
  - 9.2.1 [ADA Guidance for Document Accessibility](#)
  - 9.2.2 [ADA Guidance for 508 Compliance and Social Media Accessibility](#)
  - 9.2.3 [ADA Guidance for Video and Multimedia Accessibility](#)
  - 9.2.4 [Guide to Web Accessibility According to Section 508 Standards](#)
- 9.3. [Best Practices, Tips, and Resources to Help Ensure Your Social Media Content is Accessible](#)

## **10. Security and Privacy**

- 10.1. Social media administrators are expected to comply with the City's Privacy Policy.
- 10.2. If a security breach is suspected to have taken place or is confirmed, the social media administrator must notify their designated department manager and ITA immediately, regardless of time of day or day of the week, so that ITA can work swiftly to resolve the issue.
- 10.3. Social media administrators are expected to be judicious in the third-party applications they use in the course of their duties and take regular inventory of the applications connected to official accounts and devices. This is critical for ensuring the security of accounts.
- 10.4. Social media passwords must be different for each account as to minimize potential damage due to a security breach (i.e., unauthorized access to one account should not allow unauthorized access to other accounts).
- 10.5. Social media passwords should follow the City's password policy and be changed on that schedule and under any of the following conditions to ensure proper security:
  - 10.5.1. At the departure of a department manager or a social media administrator.
  - 10.5.2. If a potential breach is suspected or confirmed.
- 10.6. Passwords and login information should be kept in carefully stored, secure places whether online, on hard disk, or in a physical space. It is recommended to store passwords and login credentials in separate files or locations to ensure security. See the City's [Password Security Policy](#).
- 10.7. Confidential information and personal identifying information shall be protected consistent with the City's [Privacy Policy](#) and [sample disclaimer language](#).

## **11. Records Retention and Public Information**

- 11.1. Those designated and authorized to utilize social media are responsible for saving content as may be required by the department's approved records retention policies. Employees involved in moderating social media content should be trained in appropriate record retention procedures. To the extent that the records retention policies set forth in the third-party social media are inconsistent with the retention schedule in the Los Angeles Administrative Code, social media administrators should archive copies of City social media content in order to meet City records retention obligations.

- 11.2. Content on all City social media accounts, or archived from those accounts, may be subject to disclosure as required by the California Public Records Act (CPRA).
- 11.3. The public should be clearly informed that any information posted on City social media accounts is subject to disclosure. The City should advise the public against posting personal identifying information, including home and personal email addresses, on a City social media account.

## **12. Use of Social Media by Employees**

- 12.1. Social media administrators shall adhere to the principles expressed in this policy.
- 12.2. A non-FLSA exempt employee who is an authorized social media administrator shall only post content to City social media during normal business hours, including preparing content that may get posted via automated posting tools after hours. After-hours postings shall only be made with prior approval of the department manager.
- 12.3. Personal Social Media Accounts - Some personal uses of social media may reflect on the department and/or City or appear to represent policy on behalf of the department and/or City. For those reasons, when using personal social media accounts:
  - 12.3.1. If commenting on City business, employees should use a disclaimer that establishes that their comments represent their own opinions and do not represent those of the City.
  - 12.3.2. Employees may not attribute personal statements or opinions to the City when engaging in private blogging or posting on social media.
- 12.4. The City, through authorized personnel, reserves the right to access and monitor all City social media tools without prior notification.
- 12.5. No employee shall use any City seal, logo, trademark, uniform, vehicle, badge, patch, or other official City image or any City confidential information in social media postings or comments on non-City social media.

## **13. Use of Social Media by City Commissions, Boards, and Elected Officials**

- 13.1. Use of social media shall be conducted in conformance with all provisions of the Brown Act. A City decision maker in a quasi-judicial matter should refrain from commenting upon the matter and thus should avoid "friending" or "liking" parties and their representatives involved in a quasi-judicial matter.
- 13.2. The City's Comment Policy must be made available online in context with the social media site. The Comment Policy Notice is referenced in Attachment A - City of Los Angeles Commenting Policy Notice.

#### **14. Notice to Third-Parties**

- 14.1. Following or “friending” persons or organizations on City social media sites is not an endorsement by the City and is only intended as a means of communication.
- 14.2. Any references or links to a specific entity, product, service, or organization posted by individuals on the City social media sites should not be considered an endorsement by the City or its officers, employees, boards, or departments.
- 14.3. The City does not review, sponsor, or endorse any other website linked to its website or to City social media sites. The views and opinions of authors expressed on those websites do not necessarily state or reflect the opinion of the City and may not be quoted or reproduced for the purpose of stating or implying any endorsement or approval of any product, person, or service by the City.
- 14.4. The City is not responsible for content that appears on external links.
- 14.5. The City is not responsible for and does not guarantee the authenticity, accuracy, appropriateness, or security of any link, external website, or its content.
- 14.6. Investors determining whether to invest or continue to invest in the City debt offerings should not rely on information posted on the site in making their decisions to invest or not to invest. Information regarding the City’s financial position is posted at the [City Controller's site](#) and [Chief Administrative Officer's site](#).

#### **15. Attachments**

- 15.1. Attachment A - City of Los Angeles Social Media Commenting Policy Notice

## **ATTACHMENT A**

### **City of Los Angeles Social Media Comment Policy Notice**

#### **The City of Los Angeles welcomes you and your comments**

The purpose of the City of Los Angeles social media is to present information from the City to its constituents and visitors.

Comments posted to any City social media account are public. The City therefore advises against posting sensitive personal identifying information, such as home addresses and personal email addresses, on a City social media account.

A comment posted by the public on any City social media account is the opinion of the commenter or poster only and does not imply endorsement of, or agreement by the City.

The overarching purpose of comment moderation is to create a place online where users can engage in a discussion of ideas, policies, and topics without significantly infringing on the ability of other users to do so. Comments or responsive content (like an image or video) that are in violation of the policies set forth by the platform they are posted on (e.g., a comment posted on Facebook that violates Facebook's code of conduct for users) should be reported to the platform for review.

If comments or responsive content from users do not violate the platform's policies for use they are potentially eligible for moderation by the City's social media administrator.

Comments containing any of the following are subject to potential removal and/or restriction by the City:

- Off topic comments, including comments outside the jurisdiction of the City (or specific Department sites) or unrelated to the original post
- Obscene content
- Threats to any person or organization
- Solicitation of commerce, including but not limited to advertising of any business or product for sale
- Conduct in violation of any federal, state, or local law
- Encouragement of illegal activity
- Information that may tend to compromise the safety or security of the public or public systems, or
- Content that violates the privacy or security of an individual or a legal ownership interest, such as a copyright, of any party.

For public records and other requests for information, please contact the City Clerk.

To view the City's Social Media Policy, visit the IT Policies site.